

## Hall, Kristin

---

**From:** Venus, Shirin  
**Sent:** Tuesday, July 02, 2013 12:09 PM  
**To:** Hall, Kristin  
**Subject:** FW: Draft Oregon infrastructure final FR - for OGC review

Hi Kristin,

I'm forwarding this to you so that you can include it in the admin record for the OR infrastructure action. Per the delegation, OGC was given an opportunity to review and comment on our proposed final action. Sara Schneeberg reviewed it and had no comments; I communicated with Geoff Wilcox by voice mail and requested his reply by yesterday if he intended to comment on the draft final action and I have not heard from him. I think it is safe to proceed with routing the final action for signature by the RA.

Thanks,  
-Shirin

Shirin Venus  
Assistant Regional Counsel  
EPA Region 10  
Tel: 206-553-4194

This email may contain material that is confidential, privileged, and/or work product for the sole use of the intended recipient. Any review, reliance, distribution by others, or forwarding without express permission is strictly prohibited. If you are not the intended recipient please contact the sender and delete all copies.

---

**From:** Schneeberg, Sara  
**Sent:** Tuesday, June 25, 2013 6:40 AM  
**To:** Venus, Shirin; Wilcox, Geoffrey  
**Subject:** RE: Draft Oregon infrastructure final FR - for OGC review

I had glanced at it briefly and thought the approach you planned to take was fine. Don't know if Geoff has had time to look more closely.

Sara Schneeberg  
USEPA Office of General Counsel  
Phone: 202/564-5592  
Fax: 202/564-5603

---

**From:** Venus, Shirin  
**Sent:** Monday, June 24, 2013 8:11 PM  
**To:** Wilcox, Geoffrey; Schneeberg, Sara  
**Subject:** FW: Draft Oregon infrastructure final FR - for OGC review

Hi Geoff & Sara-

I haven't heard back from either of you about this FR Notice and so that probably means that you are both either (1) even busier than usual, or (2) have decided to pass on the option of reviewing this.

To jog your memory: R10 drafted in response to a rather odd public comment on an Oregon infrastructure notice from Sierra Club having to do with a proposed coal terminal in that state.

Please let me know asap if you intend to review it. Thanks!

-Shirin

Shirin Venus  
Assistant Regional Counsel  
EPA Region 10  
Tel: 206-553-4194

This email may contain material that is confidential, privileged, and/ or work product for the sole use of the intended recipient. Any review, reliance, distribution by others, or forwarding without express permission is strictly prohibited. If you are not the intended recipient please contact the sender and delete all copies.

---

**From:** Venus, Shirin  
**Sent:** Monday, June 10, 2013 5:04 PM  
**To:** Wilcox, Geoffrey; Schneeberg, Sara  
**Cc:** Hall, Kristin  
**Subject:** Draft Oregon infrastructure final FR - for OGC review

Hello Geoff and Sara:

In March Region 10 proposed to approve Oregon's infrastructure SIP for the 1997 PM<sub>2.5</sub>, 2006 PM<sub>2.5</sub>, and 2008 ozone NAAQS. We received one (negative) comment on the proposed approval which was somewhat novel. It was submitted by Robert Ukeiley on behalf of Sierra Club, and related to a proposed coal terminal that is undergoing a (minor NSR) permitting analysis by the state now. He argues that IF the project is permitted, then the SIP is inadequate, but if the state decides to deny the permit then he says that this comment is not applicable.

We've drafted the attached response. You'll see that we find that the SIP includes the necessary enforceable emission limitations to be approvable, and we also state that a SIP's adequacy cannot be determined solely on the future outcome of a particular permitting analysis. We would very much appreciate any suggestions that OGC has to offer on this draft.

**Can you get back to use within the next two weeks (by June 24), or tell us that you don't intend to provide comments if that is the case, so we can move forward with the final action?** I am also attaching the incoming comment for your reading pleasure. If it would help to set up a call to discuss anything I would be happy to do so.

Thanks in advance, -Shirin

Shirin Venus  
Assistant Regional Counsel  
EPA Region 10  
Tel: 206-553-4194

This email may contain material that is confidential, privileged, and/ or work product for the sole use of the intended recipient. Any review, reliance, distribution by others, or forwarding without express permission is strictly prohibited. If you are not the intended recipient please contact the sender and delete all copies.

---

**From:** Hall, Kristin  
**Sent:** Monday, June 10, 2013 4:35 PM  
**To:** Venus, Shirin  
**Cc:** Suzuki, Debra; Bray, Dave  
**Subject:** revised draft of Oregon infrastructure final FR - for OGC review

Hi Shirin – Here is the revised draft based on your comments and Dave’s comments. Please send on to OGC for an opportunity for review.

Thanks!

Kristin